

DOCKET FILE COPY ORIGINAL

RECEIVED

MAR - 1 1993

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of the Rules Relating to)
Permissible Uses of the Vertical)
Blanking Interval of Broadcast)
Television Signals)

MM Docket No. 92-305

COMMENTS OF THE CONSUMER ELECTRONICS GROUP
OF THE ELECTRONIC INDUSTRIES ASSOCIATION

The Consumer Electronics Group of the Electronic Industries Association ("EIA/CEG") enthusiastically supports the Notice of Proposed Rule Making released by the Commission on December 31, 1992. We applaud the Commission's intentions to alter the rules governing use of lines 19 and 21 of the vertical blanking interval ("VBI") in ways that will assuredly serve the public interest. And we welcome the Commission's commitment to try to resolve this proceeding expeditiously.

I. INTRODUCTION AND INTEREST OF EIA/CEG

EIA/CEG represents the consumer electronics industry, an industry that provides the American public with televisions, radios, videocassette recorders and videocameras, compact disc players, and a wide variety of other products. Our membership includes most major consumer electronics manufacturers, as well as many smaller companies

No. of Copies rec'd
List A B C D E

2411

that design, produce, import, distribute, sell, and service electronics products.

EIA/CEG has a strong interest in the proposals set forth in the Notice. The proposed changes in the rules governing use of line 21, field 2, of the VBI were based on a petition for rulemaking filed by EIA/CEG.^{1/} That petition was the outgrowth of EIA/CEG's steadfast efforts to promote implementation of the Television Decoder Circuitry Act of 1990 ("Decoder Act"). An EIA/CEG Task Force -- later reconstituted as the Television Data Systems Subcommittee -- formulated the specifications which served as the foundation for the Commission's initial proposal to develop regulations to implement the Decoder Act, which deals with line 21, field 1, of the VBI. Later, the Subcommittee developed plans to enhance captioning and related services through use of line 21, field 2,^{2/} and it was these plans that led to the petition EIA/CEG filed in July 1992.

^{1/} RM-8066 (filed July 7, 1992).

^{2/} In their efforts affecting line 21, field 2, EIA/CEG and the Subcommittee acted with the express encouragement of the Commission. See Amendment of Part 15 of the Commission's Rules to Implement the Provisions of the Television Decoder Circuitry Act of 1990, 6 FCC Rcd. 2420, 2431 (¶ 36) (1992) ("Decoder Act Order") (subsequent history omitted); see also id. at 2434 (¶ 43) (encouraging EIA Task Force to continue developing improvements in caption service).

EIA/CEG also has a strong interest in the Commission's proposal concerning line 19. That proposal is based on a petition for rulemaking filed by the United States Advanced Television Systems Committee ("ATSC"),^{3/} in which EIA/CEG is a charter member and some of EIA/CEG's members participate. EIA/CEG filed comments in support of ATSC's petition on September 29, 1992. In those comments, EIA/CEG urged the Commission to combine the two petitions into a single rulemaking proceeding and to act on them as soon as possible. The Commission -- acknowledging the merits of the two pending requests -- has responded promptly, favorably, and with assurances of expeditious final action.

II. DISCUSSION

The Commission's Notice reflects a welcome recognition of the value to consumers of continuing to improve the existing television broadcast service notwithstanding the considerable efforts being expended, in a separate proceeding, to develop advanced television. The NTSC environment will still be the dominant medium for at least the next ten years, and it is likely that something on the order of 200 million additional NTSC television receivers will be sold during the next decade. It is

^{3/} RM-8067 (filed Aug. 14, 1992).

entirely appropriate that the Commission continue to consider straightforward, relatively simple technical modifications that can be made to the NTSC standard that will improve the value to consumers of the television broadcast service and the associated consumer electronics equipment.

The specific improvements proposed in this proceeding are particularly timely. Because the Decoder Act and the implementing regulations require changes in the design of all televisions over 13" in screen size beginning July 1, 1993, receiver manufacturers are already modifying their designs and circuitry to include the capability to decode and display closed captions on line 21, field 1. Significant additional benefits can be provided to the consumer if the capability of decoding and displaying captioning and other data transmitted on line 21, field 2, is incorporated at the same time. We therefore welcome the Commission's recognition that "significant benefits can be derived by prompt action in this rule making." Notice at ¶ 16. An expeditious ruling will not only avoid disruption for manufacturers and expedite availability of televisions with desirable new features, but also reduce costs by enabling the transition from non-decoding sets to sets which decode fields 1 and 2 to be effectuated in a single step.

The Notice solicits comments on the specific rule changes proposed in Appendix A and also inquires about "unforeseen or overlooked problems or circumstances" which may affect the proposal. Notice at ¶ 11. Nothing has been brought to EIA/CEG's attention in the almost eight months since the petition for rulemaking was filed to suggest that the proposed rule changes require modification or that the proposed use of line 21, field 2, would be anything but salutary. We continue to believe that captioning should retain priority over other uses of line 21 but that, otherwise, the transmission of text or other data should be enabled at the program provider's option. See Notice at ¶ 9. We are aware of no potential for signals transmitted in line 21, field 2, to cause interference with the visible portion of the TV signal. See Notice at ¶ 10.

The Commission also asks about the potential for adverse interaction between line 21 and line 22 from the standpoint of line identification and decoding circuitry. Notice at ¶ 11. We do not believe this is likely to be a problem. Although we have conducted no study of the relationships between lines 21 and 22 and are aware of no study conducted by other parties, we have queried users of lines 21 and lines 22. In turn, they reported that line 21 captioning and line 22 "special signals" have coexisted for several years; insofar as they are aware, line 21 captioning

has experienced no interference from line 22. Further, they do not know of any reason why the potential for interference from line 22 would be increased by expanded use of line 21, field 2, as proposed in the Notice.

The Notice also seeks comments on the proposal by the National Captioning Institute ("NCI") that the Commission define the terms "captions," "text," and "extended data service." Notice at ¶ 12. EIA/CEG sees no need for any such definitions. In context, there is no question but that the term "captions" used in the Note to proposed Section 73.682(a)(22)(i) refers back to the more descriptive (but also more unwieldy) phrase already included at the beginning of the subparagraph: "program-related data signal which, when decoded, provides a visual depiction of information being presented on the aural channel." In any event, EIA/CEG has no objection to adding the word "captions" in parentheses after that phrase, as the Commission appears to be proposing, to eliminate any ambiguity.

EIA/CEG opposes NCI's proposed definitions of "text" and "extended data service information." NCI's proposal is unnecessary, since there will be no difference in the regulatory treatment of either form of data. It is also misleading: "text" services need not, and ordinarily will not, be "caption-related".

We will not recount here the reasons for our support of the Commission's proposal to allow for use of line 19 to transmit a signal used for ghost-cancelling. Notice at ¶ 13. It suffices to say that the line 19 proposal, like that dealing with line 21, field 2, is based on a broad industry consensus, will provide public benefits, and should not cause any significant disruption to anyone. We favor the Commission's proposal to incorporate the ghost-cancelling standard in an OET Bulletin and to reference that bulletin in the rules. Notice at ¶ 15 & Appendix A at proposed § 73.682(a)(21)(iv). This approach effectively ratifies the present industry consensus, yet also allows for future modification of the standard if warranted in light of later improvements in ghost-cancelling technology.

III. CONCLUSION

For the reasons stated above, EIA/CEG supports the Commission's proposals and urges that the rule changes set forth in Appendix A be adopted as quickly as possible.

Respectfully submitted,

Consumer Electronics Group
Electronic Industries Association

By: George A. Hanover
George A. Hanover
Staff Vice President,
Engineering

By: Kathryn McCarl Agate
Kathryn McCarl Agate
Staff Director,
Government and Legal Affairs

2001 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
(202) 457-4900

Of Counsel:

James L. Casserly
Squire, Sanders & Dempsey
1201 Pennsylvania Avenue, N.W.
Post Office Box 407
Washington, D.C. 20044
(202) 626-6600

March 1, 1993